

COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

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JUN 25 2009

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

The Application of Green River Valley)
Water District for Financing and a Certificate)
Of Convenience and Necessity to Construct) Case No. 2009-00162
A Waterworks Project)

**CAVELAND SANITATION AUTHORITY'S MOTION FOR
FULL INTERVENTION AND REQUEST FOR HEARING**

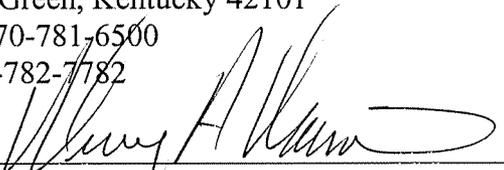
The Caveland Sanitation Authority ("Caveland") requests that it be allowed to intervene in this matter. This request is one for full intervention pursuant to 807 KAR 5:001 Section 3(8)(a) and (b). As grounds for this motion, Caveland states that it provides water to customers located in Cave City, Kentucky. Caveland purchases water from the applicant, Green River Valley Water District ("Green River"), so that capital expenditures made by Green River will directly impact the prices Caveland is required to pay Green River for purchased water and will directly impact the rates Caveland in turn charges Cave City customers. Accordingly, Caveland has a special interest in the proceeding which is not otherwise adequately represented. In addition, Caveland's intervention is likely to present issues or develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings.

The address of Caveland is Caveland Sanitation Authority, 508 South Dixie Highway, P.O. Box 463, Cave City, Kentucky 42127-0463. The undersigned is an attorney-at-law and is representing Caveland in this matter.

Caveland also requests that this matter be scheduled for an appropriate hearing before the Commission pursuant to 807 KAR 5:001 Section 4 so that all parties will have an adequate opportunity to develop and present proof that will assist the Commission in fully considering Green River's application.

WHEREFORE, Caveland Sanitation Authority requests that it be allowed full intervention in this matter and that the Commission schedule an appropriate hearing pursuant to 807 KAR 5:001 Section 4.

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By: 
Murry A. Raines

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 23 day of June, 2009, the original of the above was mailed by first class U.S. mail, postage prepaid, to the Kentucky Public Service Commission, P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; and that true and correct copies of the above were served by first class U.S. mail, postage prepaid, on Green River Valley Water District, 85 E. Les Turner Rd., P.O. Box 399, Cave City, Kentucky 42127; and Mr. Damon R. Talley, 112 N. Lincoln Boulevard, P.O. Box 150, Hodgenville, Kentucky 42748.


Murry A. Raines